

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CAROLINE SMITH-FLATOW,)	
)	
Plaintiff,)	08 C 647
)	
v.)	
)	Judge Der-Yeghiayan
CHICAGO POLICE OFFICERS)	
S. REYES (Star #17832),)	Magistrate Judge Denlow
L. Wise (Star #15647),)	
and the CITY OF CHICAGO,)	
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO'S MOTION FOR AN EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendant City of Chicago (the "City"), by its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, moves for an extension of time up to and including May 16, 2008, to answer or otherwise plead to plaintiff's complaint. In support of this motion, the City states as follows:

1. On January 30, 2008, plaintiff filed the current action, alleging constitutional violations and state law claims against multiple defendants, including the City.
2. Plaintiff's complaint and summons were served on the City on February 15, 2008. The City was due to answer or otherwise plead by March 6, 2008.
3. Undersigned counsel was assigned this matter on April 16, 2008.
4. Counsel for the City have not yet begun the process of investigating the allegations in plaintiff's complaint.
5. Therefore, counsel for the City request an extension of time to May 16, 2008, to answer or otherwise plead to plaintiff's complaint.
6. Undersigned counsel called plaintiff's counsel on April 17, 2008 to inform them of this motion.
7. This motion is the City's first request for an extension of time to answer or

otherwise plead. This request is not made for the purpose of delay or for any other improper purpose.

WHEREFORE, the City respectfully requests that this Court grant it an extension of time up to and including May 16, 2008, to answer or otherwise plead to plaintiff's complaint.

Respectfully submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: /s/ Helen C. Gibbons
HELEN C. GIBBONS
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Assistants Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 18th day of April, 2008.

/s/ Helen C. Gibbons
HELEN C. GIBBONS